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SCHOOL OF MEDICINE

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Eileen Fleck, Chief Acute Care Policy and Planning
Maryland Health Care Commission
4160 Patterson Avenue
Baltimore, MD 21215

Re: Comments to Draft Amendments to the State Health Plan for Facilities and Services:
Specialized Health Care Services- Cardiac Surgery and Percutaneous Coronary Intervention
(PCI).

Dear Ms. Fleck,

Below are comments concerning the Draft Amendments to the State Health Plan for
Facilities and Services: Specialized Health Care Services- Cardiac Surgery and Percutaneous
Coronary Intervention (PCI).

Given its complexity and acuity, "Cardiac Surgery" cannot be oversimplified and should not
be classified into sub-categories as proposed i.e. "Cardiac Surgery" or "Open Heart
Surgery". Regardless of terminology, "cardiac surgery" or "open heart surgery" the cardiac
surgery teams are highly trained and the infrastructure required to perform safe cardiac
surgery is extensive. I do not believe cardiac surgery can be simply an incision in chest or
defined as one of the usual open heart procedure e.g. operation for valve disease or
coronary artery disease. The cardiac surgery team is the most expert and necessary in any
hospital for the treatment of diseases of the heart and great vessels, the potentially lethal
complications of these diseases, and the complications of the treatments of these diseases.

As such I would like to propose an alternative method for looking at what constitutes
Cardiac Surgery as follows:

A. Any procedure performed on the pericardium, heart or great vessels which is typically
performed by a cardiac surgery team and,

B. Any procedure performed on pericardium, heart or great vessels the potential complications of which would require both the infrastructure and specialty expertise of a cardiac surgery team for safe, appropriate and timely management.

The following codes do not appear as cardiac surgery in the new definition yet have the above definition in common.

37.12 Pericardiotomy: Repair of ventricular septal defect with prosthesis, closed technique

37.24 Biopsy of pericardium (In the setting of complex pericardial disease this can be very dangerous and should be performed by a cardiac surgery team)

37.25 Biopsy of Heart (as above)

37.49 Other repair of heart and pericardium

37.99 Other operations on heart and pericardium

37.99 Other operations on Heart or Pericardium

38.04 Incision of vessel- Aorta (In the Chest this is Cardiac surgery)

38.05 Incision of Vessel other Thoracic

38.14 Endarterectomy, Aorta (In the chest this is Cardiac Surgery)

38.15 Endarterectomy Other Thoracic Vessel

38.34 Resection of Vessel with Anastomosis- Aorta

38.35 Resection of Vessel with Anastomosis- other Thoracic

38.45 Resection of Vessel with replacement- Thoracic Vessels (this is Cardiac surgery and requires the heart lung machine)

39.52 Other Repair of Aneurysm

39.53 Repair of Arteriovenous fistula

39.54 Reentry Operation – Aorta

39.56, 57, 58, and 59 Repair of blood vessel with/without patch

39.63 Cardioplegia

39.65 Extracorporeal Membrane Oxygenation (Requires a cardiac surgery team to run the

machine and manage the patient)

39.66 Percutaneous Cardiopulmonary by pass (see above)

78.51 Internal fixation of bone- Sternum (if patient has had prior surgery any bleeding in this setting could be catastrophic and lethal- a cardiac surgeon should be involved in or perform this operation)

84.94 Insertion of Sternal fixation device (see above)

Although the codes listed below are included in the proposed definition of "cardiac surgery" they are not included in the definition for volume requirements, but should because they require the resource capability to perform cardiac surgery.

35.55 Repair of ventricular septal defect with prosthesis, closed technique
(Note: Repair for atrial septal defect closed technique is in new definition)

35.97 Percutaneous Mitral Valve Repair with Implant (note- this is performed by Cardiac surgical and Cardiology teams)

36.32 Transmyocardial Revascularization (note- This is an alternative option for treatment of Coronary Heart Disease performed by a cardiac surgeon)

37.36 Excision, destruction, or exclusion of left atrial appendage (LAA) (note- This is potentially lethal if a complicated. Most should be performed as a direct procedure on the heart and requires heart team back up)

37.41 Implantation of prosthetic cardiac support device around the heart (This is Cardiac Surgery)

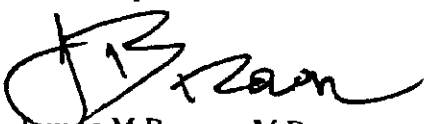
37.67 Implantation of Cardiomyostimulation System

37.74 Insertion of Epicardial Lead into pericardium

37.93 Injection of Therapeutic Substance into pericardium

I would urge these codes be included in the definition of cardiac surgery and in the volume requirement calculation

Sincerely,



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